

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VERDELLE WATSON,

07 CV 5777 (DC)

Plaintiff,

-against-

THE LONG ISLAND RAILROAD
COMPANY,

Defendant.
-----X

VOIR DIRE

1. Name, address and occupation.
2. Name and occupation of spouse.
3. Are you acquainted with or have you done any business with the parties herein, their doctors or their attorneys?
4. Have you previously served as jurors? If so, what type of case? And, have you taken testimony and/or rendered a verdict?
5. Have you or any members of your family been involved in any accident which was the subject of a lawsuit or claim? If so:
 - (a) who was involved?
 - (b) brief description of the accident;
 - (c) whether the experience would in any way affect your judgment as far as this lawsuit is concerned.
6. Can and will you accept the premise that, unlike state law where an injured employee is covered by Workman's Compensation, federal law permits an injured railroad worker to sue his employer directly?

7. Have you read or been exposed to any materials in the media concerning the so-called "insurance crisis", and, if so, does this information affect your judgment in personal injury lawsuits?

8. Do you often ride trains?

9. Have you ever ridden Long Island Railroad Company trains?

10. Do any of you suffer from foot injuries?

11. Do any of you know anyone with a foot injury?

12. Would you be able to return a verdict for the plaintiff in a large amount of money if the proof demanded it?

13. Do any of you have any friends or relatives working on the Long Island Railroad?

14. Do any of you know any of the following people who may or may not be called as witnesses? (The Court can name the witnesses.)

15. Have any of you ever sued or been sued and did it leave any particular feelings with you towards plaintiffs, defendants, lawyers or judges? (Ask for details of said lawsuits.)

16. Do any of you know personally, socially or in a medical capacity the following doctors? (The Court can name the doctors.)

17. Is any member of your immediate family a lawyer or a doctor?

18. Do you have any close friends who are lawyers or doctors?

19. What type of practice does the lawyer have? What type of practice does the doctor have?

20. Do you feel that everyone who brings a lawsuit is entitled to recover regardless of whether or not they make out a case under the law as given to you by the Court?

21. Have you ever sued anyone or have you ever been sued?

22. Do you have any personal feelings one way or the other against the defendant?
23. Do you have anything against The Long Island Railroad Company or any of its employees?
24. Have you ever had any experience(s) with The Long Island Railroad Company, either favorable or unfavorable?
25. Do any of you feel that the fact that a plaintiff brings a lawsuit has had a prior problem with the part of his body he claims to have injured in his suit mean he has no right to seek money damages for the aggravation or exacerbation of the injured he says was the case in the accident he is suing for.
26. Are any of you an employee of a party to the action?
27. Are any of you a shareholder or a stockholder of The Long Island Railroad Company?
28. Are any of you a shareholder, stockholder, director, officer or employee, or in any manner interested, in any insurance company issuing policies for protection against liability for damages for injury to persons or property?

Dated: New York, New York
July 24, 2008

Respectfully submitted,

SABLE & GOLD
Attorneys for Plaintiff

By: 

Fredric M. Gold (3286)
450 Seventh Avenue
New York, NY 10123
(212) 244-2740

To: LIRR Law Department
Jamaica Station
Jamaica, New York 11435
Attn: Christopher P. Yodice, Esq.